Date: October 31, 2001

To: Scott Griffin, BellSouth Account Manager, Paula Murphy, BellSouth Product Manager-UCL-ND

From: Colette Davis, Covad Director ILEC Relations

CC: Kasey Howard, Lori Stabler, Sandra Howard, Eddie Echols, Donald Rubin, Frances Johnson, Chad

Wollenburg, Trent Sears, Karin Dachowski, Mike Wilburn, Farris Huff

Re: UCL-ND Testing Issues

This morning Covad Operations had a conference call with Kasey Howard to discuss issues related to provisioning and testing of the UCL-ND loop. I am formally sending this memo to Scott and Paula to address the issues listed below but I also committed to Kasey to provide these issues for a meeting that he is attending with his BellSouth Support Staff this afternoon. It is critical that Covad receive responses to the issues that we are experiencing with this loop by Friday, November 2, 2001.

Just to recap the history for everyone copied on this memo. Covad initially ordered 13 UCL-ND loops and met with several issues regarding the ordering and installation. These stemmed from incorrect issuance of the LSR by the LCSC (leaving off the test USOC) to problems with installation of the loop and confusion on testing. Kasey Howard graciously held an audience with us to hear our concerns specific to another 20 orders that we have placed with BellSouth. Based on this email, the problems Covad encountered in the first group of 13 orders are mapping over to these current 20 orders. All of the problems are indicating a clear lack of lack of understanding of this loop within BellSouth Operational teams and gaps in the documentation regarding procedures issues.

The issues below address specific questions relating to problems we encounter with BellSouth in the delivery of the loops.

- 1. Procedural clarification necessary with the outside technicians when they call to advise Covad of turnup. BellSouth techs need to provide demark information to Covad on orders where testing is not ordered. We understand that Covad will receive a call from the outside technician with this information notifying us of loop delivery and providing us with demark information. If we do not receive this call, based on the call with Kasey this morning, we should escalate. What Covad is hearing from the CWINS Center rep is that they do not handle these types of loops and they do not know what to do.
- 2. Procedural clarification necessary with CO Technician on how to wire, test, trouble shoot this new loop. Covad has experienced and documented with BellSouth on the first 13 UCL-ND loops that this is a problem. (Covad understands the CO has till end of day to complete wiring). This is not related to that issue but to quality of BellSouth work. Covad has experienced a high percentage of incorrect wiring issues within the CO. The CO has been open in and Covad had orders where the CO was wired for dial tone. The CO has also had problems finding the correct pair. When will the CO Tech get more training? Can we get clarification on pair change issues? Paula Murphy had told us that the tech in the field could change the pair if facilities are available. Is this still the case?
- 3. BellSouth Field technicians are confused about this loop product. They have been asking Covad for the telephone number on the order. The have asked Frances Johnson, Covad Service Delivery, how to deliver the loop. It is critical that specific product training be given these techs? Technicians need training on BellSouth test responsibilities when testing is order and when testing is not. For example, when testing is ordered, the outside tech will call the CWINS group who will contact Covad to test and accept the loop. When the joint testing is not ordered, the Tech still must call to say the loop has been delivered and provide demark.
- 4. Additional Ouestions from Covad:
- What is the process that Covad will encounter in the installation, test, and acceptance of a loop that is QuickServe and being used for the UCL-ND loop type? Covad is receiving feedback from BellSouth that they do not dispatch out to demark on these order and that demark is tagged that work is only done in the CO. How does Covad get Demark information on QuickServe loops?
- In the TR73600 it states the following: "The tie cabling is not part of the unbundled loop"-- Covad wants to know who maintains this and what is the process if this is a point of failure?
- In the TR73600 it states the following: "BST reserves the right to disconnect a service or equipment connected to an unbundled local loop that is shown to be causing harm to other services or systems"— What are the BellSouth procedures for notifying the CLEC when they encounter a trouble on their

- customer's line? BellSouth should not disconnect any Covad customer. At this time, Covad has no procedures to reference regarding how Covad is notified by BellSouth of this condition and how the problem will be resolved rather than end in a Covad customer being disconnected.
- Field Technicians have been confused and do not know who to call because some the service orders say Dieca Communications and some say Covad. What is driving this notation? Where does it need to be corrected? Covad is issuing the orders the same? Where is this getting translated?
- A tech has reported that the 877 number from Covad is not on the order. Why isn't this number being put on the order?

I do appreciate your attention in resolving and clarifying the UCL-ND loop product as Covad's goal is to order these loops with the least amount of intervention by BellSouth and Covad Operational Teams. Again, I would like feedback on the resolution to these issues by Friday, November 2, 2001. If necessary, I can convene the Covad individuals copied on this email to conference with BellSouth this Friday.

Colette Davis

Director, ILEC Relations Covad Communications